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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Preparation for International )  
Telecommunications Union World )  
Radiocommunication Conferences )

IC Docket No. 94-31

To: The Commission

REPLY COMMENTS OF UTC

Pursuant to Section 1.415 of the Commission's Rules, UTC<sup>1/</sup> hereby submits its reply comments with respect to the Second Notice of Inquiry, FCC 95-36 (Second NOI), released January 31, 1995, in the above captioned matter. By the Second NOI the FCC seeks comment on preliminary proposals for the 1995 World Radiocommunication Conference (WRC) and future WRCs.

I. Commenters Oppose Identification of PLMR Spectrum for NVNG MSS

As the national representative on communications matters for the nation's electric, gas, and water utilities, and natural gas pipelines, UTC filed comments in this proceeding. UTC's comments focused on its adamant opposition to the identification of the 150-174, 450-470 and 470-512 MHz bands as potential candidate bands for the location of non-voice, non-geostationary (NVNG) mobile satellite service (MSS).

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<sup>1/</sup> UTC, The Telecommunications Association, was formerly known as the Utilities Telecommunications Council.

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Various private land mobile users -- ranging from the Association of American Railroads to the Association of Public-Safety Communications Officials-International -- echoed UTC's comments that the private land mobile radio bands below 512 MHz are not suitable bands for NVNG MSS. As UTC and others noted, these bands are some of the most intensely used frequencies in the country with an 8-10 percent annual growth rate. Of the estimated 15 million private land mobile radio transmitters nationwide, approximately 81 percent are licensed on frequencies below 512 MHz.

More importantly, these frequencies are vital to the nation's core public safety and public service organizations. Private land mobile radio is the vital link in virtually all utilities' communications systems. Given the importance of communications to safe, secure and reliable utility service, the potential interference from NVNG MSS is simply unacceptable.

## **II. MSS Feeder Links Should Not Be Located in the 6 GHz Band**

UTC opposes the Commission's proposal to locate MSS feeder links in the 6 GHz band. The upper and lower portions of the 6 GHz band are currently allocated to the Common Carrier and Private Operational Fixed Microwave Services, to superimpose an incompatible service such as MSS on to this spectrum would significantly disrupt existing and planned microwave operations on these frequencies.

Many utilities and pipelines operate extensive private microwave systems in order to carry out their public service obligations. A large number of these systems are located in the upper 6 GHz microwave band. Moreover, as a result of the FCC's reallocation of the 2 GHz microwave band to emerging technologies, ET Docket 92-9,<sup>2/</sup> the 6 GHz microwave band has effectively become the only remaining "long-haul" microwave band and is viewed as the primary candidate band for the relocation of the approximately 29,000 existing 2 GHz microwave systems.

In fact, a fundamental aspect of the Commission's "transition plan" for the relocation of incumbent 2 GHz microwave users was the availability of adequate replacement spectrum, and it is for this reason that the Commission adopted a Second Report and Order in ET Docket No. 92-9,<sup>3/</sup> reallocating the 6 GHz microwave bands to the private operational and common carrier fixed microwave services on a co-primary basis.

The introduction of MSS feeder links into the 6 GHz band is likely to cause unacceptable interference to point to point microwave systems operated by utilities and pipelines. In addition to the significant harm that this would cause to existing microwave operations, it would also likely render the

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<sup>2/</sup> Third Report and Order and Memorandum Opinion and Order, ET Docket No. 92-9, 8 FCC Rcd 6589 (1993).

<sup>3/</sup> Second Report and Order, ET Docket 92-9, 8 FCC Rcd 6495 (1993).

bands useless as replaced spectrum for displaced 2 GHz users. This could result in significant delays and additional expenses in the development of PCS, since a key element in the transition plan is that comparable replacement systems must be in place prior to the involuntary removal of the incumbent 2 GHz microwave licensees. Many of the alternatives to 6 GHz as replacement systems (e.g., higher bands, fiber optics), if feasible at all, could be prohibitively expensive.


In addition to the interference potential from MSS to fixed microwave systems that could arise from a co-allocation of these services, there is also significant likelihood of interference from fixed microwave systems to MSS receivers. This is because MSS receivers, unlike fixed satellites, can appear anywhere in the sky and will at various times occupy all points of the compass as they go over the horizon.

For all of the above reasons, UTC opposes an allocation of any portion of the 6 GHz microwave bands for the introduction of MSS feeder links.

**WHEREFORE, THE PREMISES CONSIDERED, UTC respectfully**  
requests the Commission to take action consistent with the views  
expressed herein.

Respectfully submitted,

**UTC, The Telecommunications  
Association**

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